

EXHIBIT 2

[REDACTED VERSION]

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

Case No. 2:21-cv-00563-JCC

PLAINTIFFS' NOTICE OF FED. R. CIV.
P. 30(b)(1) DEPOSITION OF GABE
NEWELL

1 PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(1) of the Federal Rules of Civil
2 Procedure and applicable Local Civil Rules for the United States District Court for the Western
3 District of Washington, Plaintiffs Wolfire Games, LLC, Dark Catt Studios Holdings, Inc., and
4 Dark Catt Studios Interactive LLC (collectively, Plaintiffs), on behalf of themselves and the
5 putative class, by and through their co-lead counsel, will take the deposition of Gabe Newell at
6 the offices of Wilson Sonsini Goodrich & Rosati, P.C., 701 Fifth Avenue Suite 5100, Seattle,
7 Washington 98104, on November 21, 2023, commencing at 9:00 a.m. Pacific Time. Plaintiffs
8 understand that the witness is employed by, and under the control of, Defendant Valve
9 Corporation.

10 The deposition will continue from day to day until completed as provided in the Federal
11 Rules of Civil Procedure and the deposition protocol in this case, and shall be taken before an
12 officer, notary public, or other person duly authorized to administer oaths. Pursuant to Fed. R.
13 Civ. P. 30(b)(3), the testimony will be recorded by stenographic, audio, video, and/or real-time
14 stenographic means. Plaintiffs reserve all available rights to use the witness' testimony in any
15 such means as may be permitted including in connection with motions, hearings, trial, and/or
16 other proceedings in this litigation.

17 Counsel for Valve has stated [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
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Dated: November 1, 2023

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